REMARKS

This Amendment, submitted in response to the Office Action dated March 25, 2004, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 40-43 are added, hence, claims 1-43 are all the claims pending in the present application. Claims 1-27 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over ezWriter 2.0 for Windows (hereinafter ezWriter), by Lance Vaughn, Atlanta, IN, in view of Bromberg et al. (hereinafter Bromberg), U.S. Patent No. 6,529,889. Claims 28-39 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over ezWriter and Bromberg and further in view of Poole et al., U.S. Patent No. 6,6006,242. Applicants submit the following in traversal of the rejections.

Rejection of claims 1-27 under § 103(a) as being unpatentable over ezWriter in view of Bromberg

Claim 1 recites "a method for reordering content in a content object stored as a plurality of hierarchically related content entities in a data repository, each content entity having an identifier." The method includes "defining the content object with a list of content entity identifiers such that moving a content entity identifier to a new location within the list redefines the order of the object's content entities." ezWriter is cited for teaching these aspects of claim 1.

Claim 1 also recites "wherein the hierarchically related content entities further comprise a parent container type and a child container type, wherein parent containers can contain child containers, and child containers can contain content entities." The Examiner acknowledges that ezWriter does not teach this aspect of claim 1 and cites Bromberg to cure the deficiency.

ezWriter is a utility program "to assist with the organization of outlines, concepts, notes, chapters, etc." See ezWriter p. 2 It uses two types of files, a series of rich text format (RTF) files that hold data entered by a writer, such as notes and other text (*Id.*) and an ezWriter file (.ezw) which is an ASCII text file that "is just an index of (or series of pointers to)" the RTF files. See ezWriter p. 7. In describing "[w]hat's so cool about ezWriter," the reference states that there will be "[n]o more getting caught up in the cumbersome environment of full-blown word-processors -- ezWriter is a streamlined environment developed specifically for writers!" See ezWriter p. 3. The ezWriter file (.ezw) contains an outline of entities corresponding to the RTF files and uses periods preceding each entry to indicate the relationship between the various entries, as stated at page 7 and reproduced below.

> As you can see, the periods are used to indicate the relationship between the various entries. Any entry with only one preceding period resides at the top level. All entries must have at least one period. To create a child entry of another entry, just add it beneath the particular entry with one extra period.
> .A Parent Entry
> ..A Child of That Entry
> ..Another Child of That Entry

In the Office Action it is asserted that Bromberg, in showing a topic hierarchy and a display for displaying questions related to the topic, discloses hierarchically related content entities comprising a parent container type that can contain a child container type. Even assuming for the moment that Bromberg discloses such parent and child container types, the topics (or "content entities" as asserted in the Office Action) of Bromberg are different than the ezWriter .rtf files which are asserted in the Office Action to be the claimed "content entities."

Consequently, it is respectfully submitted that, as would be apparent to one of ordinary skill in the art, it would not have been obvious at the time of the invention to modify the ezWriter to use the parent and child container types instead of the .rtf files disclosed in ezWriter.

Also, modifying ezWriter to use Bromberg's parent and child containers in place of the .rtf files disclosed in ezWriter would destroy the principle operation of ezWriter, and hence, would not have been an obvious modification to a person of ordinary skill at the time of the invention. See MPEP 2143.01 "The Proposed Modification Cannot Change the Principle of Operation of a Reference." ezWriter, in keeping with its stated goal of providing a "streamlined environment developed especially for writers," uses only a sequence of periods preceding the entries in the ezWriter file to indicate the relationships between those entries such that "to create a child entry of another entry, just add it beneath the particular entry with one extra period." See ezWriter p. 8.

It is respectfully submitted that ezWriter does not teach or even suggest the use of containers, much less that a parent container can contain a child container, as required by claim 1 for example. To modify ezWriter to abandon its use of the sequence of periods in front of the entries in the .ezw file and instead use parent and child containers in which a parent container can contain a child container, would fundamentally change the principle of operation of how ezWriter represents relationships among entities. Accordingly, it would not have been obvious to modify ezWriter to replace its technique of using a sequence of periods to represent relationships with the parent/child containers of Bromberg.

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The motivation given in the Office Action for modifying ezWriter to use the parent/child

containers of Bromberg is that the rollup feature disclosed in Bromberg could be used to make

"set wide" changes throughout the ezWriter set of files. It is respectfully submitted, however,

that the prior art neither teaches nor suggests such a motivation. The Office Action states that

Bromberg discloses that the rollup feature that accompanies the use of parent/child containers

can be used to allow a parent container to contain information on the activity of containers that

are subordinate to it (child containers). However, there is no suggestion of making set wide

changes nor does the prior art suggest a need to make such changes. Accordingly, it is

respectfully submitted that there is no teaching or suggestion in the prior art to make the asserted

combination.

For at least these reasons it is respectfully submitted that the combination of ezWriter

with Bromberg would not have been obvious and accordingly, claims 1, 4, 8, 11, 15, 18 and their

dependent claims should be deemed patentable.

Rejection of claims 28-39 under § 103(a) as being unpatentable over ezWriter and Bromberg and further in view of Poole

Claims 28-39 should be deemed patentable by virtue of their dependency to independent

claims 1, 4, 8, 11, 15, and 18 for at least the reasons set forth above and because Poole does not

satisfy the deficiencies of ezWriter and Bromberg.

New claims

Applicants add new claims 40-43. Support for these claims is found at least at pages 93-

96. It is respectfully submitted that the ezWriter program does not disclose moving a content

entity identifier from a first list of content entity identifiers based on a location specified from a

second list of content entity identifiers. Therefore, claims 40-43 should be deemed patentable in

view of the ezWriter program.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

Billy Cater Raulerson   BILLY CARTER RAULERSON
                           REG. NO. 52,156

SUGHRUE MION, PLLC   for   J. Warren Lytle, Jr.
Telephone: (202) 293-7060   Registration No. 39,283
Facsimile: (202) 293-7860

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